# MRJC Merhab Robinson, Jackson & Clarkson

Marla Merhab Robinson James T. Jackson\* Paula A. Clarkson\* T. Rubina L. Andonian \*A Professional Corporation + Certified Specialist in Estate Planning, Trust, and Probate

Law, The State Barof California Board of Legal Specialization

December 11, 2013

Mr. Luis Lodrigueza Orange County Health Care Agency Environmental Health 1241 East Dyer Rd., Ste. 120 Santa Ana, CA 92705 RECEIVED

DEC 13203

# 5260

HCA COR

Re: The Reynolds Group v. Universal Molding Company, et al.

OCSC Case No.: 30-2012-00543932

Dear Mr. Lodrigueza:

This office represents the interests of Defendant, Universal Molding Company ("Universal"), in the above matter. We are serving you with the attached subpoena to require your attendance and testimony at the upcoming trial in the above-referenced case.

We are required to serve appearance subpoenas on all parties that we intend to call as witnesses at trial. We apologize for any inconvenience that your appearance at trial will cause, however, we believe that your testimony is vital to the interest of our clients.

Since continuances of the trial date are possible, and since the exact date on which your trial testimony will be required are not yet certain, we are willing to waive your mandatory appearance on the first day of trial. If you signify your willingness to appear at a later date in response to our telephone notice.

Specifically, we will waive your appearance on the first day of trial if you agree to appear at a later date upon a minimal of 24 hours notice. Although we agree go a minimum of 24 hour notice, we will provide you with as much notice as possible.

If you agree to appear at trial on 24 hours telephone notice, please sign the copy of this letter at the place indicated and also please provide us with both day time and evening telephone numbers so that we can contact you.

If you select not to sign this "on call" letter, you must appear on the date and time indicated on the Subpoena.

Mr. Luis Lodrigueza Orange County Health Care Agency Environmental Health December 11, 2013 Page 2



Please feel free to contact me to discuss this matter. Thank you for your anticipated cooperation.

Sincerely,

MERHAB ROBINSON, JACKSON & CLARKSON, A Professional Corporation

mes T. Jackson

JTJ:mk Enclosure

Visit us on the web at http://www.mrjclaw.com and www.mrjcestateplanning.com Responsive-Reliable-Respected

I agree to appear at trial upon telephone notification:

Name: Lius Lodrique 40

Contact Numbers: Dalf - Office - 714-433-6253

Frening - cell - PRVY-Controlled/Privacy

# Lodrigueza, Luis

From: Montoya, Rey

Sent: Monday, December 30, 2013 12:47 PM

To: Lodrigueza, Luis
Cc: Higgins, Geniece

Subject: 1666776 Subpoena - Witness Letter - Luis Lodriguez for hearing starting 1.13.14

Attachments: 1666776 Subpoena - Witness Letter - Luis Lodríguez for hearing starting

1.13.14DOC.PDF; INSTRUCTIONS FOR WITNESS TESTIMONY 8 08.doc; 166676

Lodrigueza WITNESS FEE TRACKING FORM.doc

Luis.

You have been subpoenaed to appear as a witness in the case of THE REYNOLDS GROUP VS. UNIVERSAL MOLDING COMPANY starting on January 13, 2014 9:30 AM, at the CENTRAL JUSTICE CENTER, 700 WEST CIVIC CENTER DRIVE, SANTA ANA, CA 92701 DEPT 25.

Please read, complete information on page two of the attached "ON CALL" letter from the attorney, and return the letter to the attorney to secure your "ON CALL" status.

Please read the attached INSTRUCTIONS FOR WITNESS TESTIMONY.

After your appearance, please complete the attached WITNESS FEE TRACKING FORM and return the form to the Custodian of Records for processing.

If you have any questions, please do not hesitate to call me at 834-3536.

Thank You.

Rey Montoya
Records Manager,
HCA Custodian of Records
200 W. Santa Ana Blvd., Suite 125
Santa Ana, CA 92701
Phone: (714) 834-2044
RMontoya@ochca.com





DATE:

December 30, 2013

TO:

LUIS LODRIGUEZA

**ENVIRONMENTAL HEALTH** 

FROM:

Rey Montoya

Custodian of Records Office

HCA / Administration

SUBJECT:

Subpoena - 166676

LUIS LODRIGUEZA has been subpoenaed to appear as a witness in the case of THE REYNOLDS GROUP VS. UNIVERSAL MOLDING COMPANY starting on January 13, 2014 9:30 AM. at the CENTRAL JUSTICE CENTER, 700 WEST CIVIC CENTER DRIVE, SANTA ANA, CA 92701 DEPT 25.

Please read, complete information on page two of the "ON CALL" letter from the attorney, and return the letter to the attorney to secure your "ON CALL" status.

Please read the attached INSTRUCTIONS FOR WITNESS TESTIMONY.

After your appearance, please complete the attached WITNESS FEE TRACKING FORM and return the form to the Custodian of Records for processing.

If you have any questions, please do not hesitate to call me at 834-3536.

Attachment: Subpoena 166676

cc: Geniece Higgins

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address)	FOR COURT USE ONLY
James T. Jackson, Esq. (SBN 153587)  MERHAB ROBINSON, JACKSON & CLARKSON  A PROFESSIONAL CORPORATION  1551 North Tustin Ave., Ste. 1020  Santa Ana, CA 92705	166676
TELEPHONE NO (714) 972-2333 FAX NO	DECENTED
TELEPHONE NO (714) 972-2333 FAX NO ATTORNEY FOR (Name) Defendant, UNIVERSAL MOLDING COMPANY,	RECEIVED
NAME OF COURT SUPERIOR COURT OF THE STATE OF CALIFORNIA STREET ADDRESS MAILING ADDRESS CITY AND ZIP CODE SANTA ANA, CA 92705 BRANCH NAME CENTRAL JUSTICE CENTER	DEC 13 2013 7 35 THE TOTAL TOT
PLAINTIFF/PETITIONER: THE REYNOLDS GROUP, a California corporation, DEFENDANT/RESPONDENT: UNIVERSAL MOLDING COMPANY, et al.	
CIVIL SUBPOENA  For Personal Appearance at Trial or Hearing	30-2012-00543932

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of witness, if known): Luis Lodrigueza c/o Orange County Health Care Agency, Environmental Health, 1241 East Dyer Rd., Ste. 120, Santa Ana, CA 92705

 YOU ARE ORDERED TO APPEAR AS A WITNESS in this action at the date, time, and place shown in the box below UNLESS you make an agreement with the person named in item 2;

a. Date: January 13, 2013		X Dept.: 25	, Div.:	Room:
b. Address: 700 West Civic C	enter Drive, Santa Ana	, CA 92701		

- 2. IF YOU HAVE ANY QUESTIONS ABOUT THE TIME OR DATE FOR YOU TO APPEAR, OR IF YOU WANT TO BE CERTAIN THAT YOUR PRESENCE IS REQUIRED, CONTACT THE FOLLOWING PERSON BEFORE THE DATE ON WHICH YOU ARE TO APPEAR:
  - a. Name of subpoening party or attorney: James T. Jackson, Esq.

b. Telephone number: (714) 972-2333

3. Witness Fees: You are entitled to witness fees and mileage actually traveled both ways, as provided by law, if you request them at the time of service. You may request them before your scheduled appearance from the person named in item 2.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: December 11, 2013

James T. Jackson, Esq.

(TYPE OR PRINT NAME)

(SIGNATURE OF PERSON ISSUING SUBPOENA)

Autorney for Defendant, Universal Molding Company

# Requests for Accommodations

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least 5 days before the date on which you are to appear. Contact the clerk's office or go to www.courtinfo.ca.gov/forms for Request for Accommodations by Persons With Disabilities and Order (form MC-410). (Civil Code, § 54.8.)



(Proof of service on reverse)

St	IR	P	"n	ñ	,

PLAINTIFF/PETITIONER: THE REYNOLDS GROUP, a California

CASE NUMBER

corporation,

DEFENDANT/RESPONDENT: UNIVERSAL MOLDING COMPANY, a C

30-2012-00543932

# PROOF OF SERVICE OF CIVIL SUBPOENA FOR PERSONAL APPEARANCE AT TRIAL OR HEARING

I served this Civil Subpoena for Personal Appearance at Trial of follows:	r Hearing by personally delivering a copy to the person served as
a. Person served (name):	
b. Address where served:	
c. Date of delivery:	
d. Time of delivery:	
e. Witness fees (check one):  (1) were offered or demanded and paid. Amount:	
f. Fee for service:	
I received this subpoena for service on (date):	
<ul> <li>3. Person serving:</li> <li>a. Not a registered California process server.</li> <li>b. California sheriff or marshal.</li> <li>c. Registered California process server.</li> <li>d. Employee or independent contractor of a registered California process server.</li> <li>e. Exempt from registration under Business and Professional Photocopier.</li> <li>g. Exempt from registration under Business and Profession.</li> <li>h. Name, address, telephone number, and, if applicable, county</li> </ul>	ons Code section 22350(b). ons Code section 22451.
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.	(For California sheriff or marshal use only) I certify that the foregoing is true and correct.
Date:	Date:
<b>&gt;</b>	
(SIGNATURE)	(SIGNATURE)

# RECEIVED

Paul Irby, Esq. (State Bar 057379) 194 Shawnee Drive, Wheeling, West Virginia Telephone: (714) 838-5932

1

2

3

4

6

8

9

10

11

12

13

14

15

16

17

18

20

21

22

23

26

27

Brian M. Brown, Esq.(State Bar 093570) 23161 Mill Creek Dr., Suite 340 Laguna Hills, California 92653 Telephone: (949) 215-2700

Attorney(s) for Plaintiff & Cross-Defendant,
THE REYNOLDS GROUP

HCA COR

CH #744665

ORIGINAL

182/3

# SUPERIOR COURT OF THE STATE OF CALIFORNIA

### COUNTY OF ORANGE

THE REYNOLDS GROUP, a California Corporation,

Plaintiff,

Vs.

UNIVERSAL MOLDING COMPANY, a California corporation; and DOES 1 through 10, inclusive,

CASE NO: 30-2012 0054932-CU-BC-CJC

ACKNOWLEDGMENT OF SERVICE OF CIVIL SUBPOENA AND AGREEMENT TO APPEAR

Defendant(s).) Trial Date: Feb. 10, 2014

Time: 9:30 a.m.

Department: C-25

AND RELATED CROSS-ACTION. ) Assigned for all purposes to:
Hon. Thierry Colaw

ACKNOWLEDGMENT OF SERVICE OF CIVIL SUBPOENA

# AND AGREEMENT TO APPEAR

I hereby acknowledge service of a Civil Subpoena for Personal Appearance at Trial or Hearing, requiring me to appear as a witness in the above-entitled action on February 13, 2014 at 9:30 a.m. in Department C-25 of the Orange County Superior Court, located at 700 Civic Center Drive West, Santa Ana, California 92701. In lieu of appearing at that date and time, I hereby agree to appear at the request of Brian M. Brown,

,	Esq. upon reasonable notice, which I understand will be at least twenty-
2	four (24) hours.
3	Executed this // day of February, 2014 at Santa Ava
	140
4	California.
5	LUIS LODRIGUEZA
6	6 D 122 1 = ==
7	Business Telephone: (714) 433-6253  PRVY-Controlled/Privacy
8	Email: Nodrigue rala ochca.com
9	Email: Lodrique ra a ochca. com
10	
11	Please date and sign this agreement, and return it to Brian M.
12	Brown, Esq. at Fax. No. (949) 743-3000, or in PDF format to:
13	brianbrown@oclaborlawyer.com
14	
15	
16	RECEIVED
17	
18	FEB 107"4
19	HCA COR
20	CH # 74665
21	1.17005
22	
23	
24	
25	
26	



可写真の

DATE:

February 11, 2014

TO:

LODRIQUEZA, LUIS

**ENVIROMENTAL HEALTH** 

FROM:

Jovita Gonzalez

Staff Specialist

Custodian of Records Office

HCA / Administration

SUBJECT:

Subpena - 167213

As per our conversation, LODRIQUEZA, LUIS has been subpoenaed as a witness in the case of THE REYNOLDS GROUP VS. UNIVERSAL MOLDING COMPANY on February 13, 2014.

With the concurrence of the attorneys involved, you have been placed on-call for 10 days beginning February 13, 2014 thru February 21, 2014 and will be called when needed to testify. Please remain readily available on that day so that the attorneys should have little trouble in contacting you.

Please read the INSTRUCTIONS FOR WITNESS TESTIMONY also.

After your appearance, please complete the WITNESS FEE TRACKING FORM and return the form to the Custodian of Records for processing.

The subpena is a necessary addition to the patient's history with the Agency, therefore, please file a copy in the patient's chart.

If you have any questions, please do not hesitate to call me at 834-3536.

Attachment

cc: Geniece Higgins

	SUBP-00
ATTORNEY OR PARTY WITHOUT ATTORNEY (Ivame State Bar number, and address)	FOR COURT USE ONLY
- Brian M. Brown 093570	
Law Offices of Brian M. Brown 23161 Mill Creek Drive, Suite 340	RECEIVED
Laguna Hills, CA 92653	VECEIVED
TELEPHONE NO (949) 215-2700 FAX NO (949) 743-3000	550 1 0 000
ATTORNEY FOR (Name) Plaintiff The Reynolds Group	FEB 1 0 2014
NUME OF COURT ORANGE COUNTY SUPERIOR COURT	FOU PM Del
street address 700 Civic Center Drive West	HCA COR
MAILING ADDRESS	
CITY AND ZIP CODE Santa Ana, CA 92701	CH# 746
PLAINTIFF/PETITIONER: The Reynolds Group,	ORIGINAL *2
PLAINTIFF/PETITIONER: The Reynolds Group,	C VILIDIA VALL
DEFENDANT/RESPONDENT Universal Molding Company	
CIVIL SUBPOENA	CASE NUMBER
For Personal Appearance at Trial or Hearing	30-2012 00543932
UNLESS you make an agreement with the person named in item 2:  15 (A) 201-CAM 2/2//4  2. Date: 2/13/2014 Time: 9:30 a.m. X Dept::C-25  2. Address: 700 Civic Center Drive West, Santa Ana, CA	
IF YOU HAVE ANY QUESTIONS ABOUT THE TIME OR DATE FOR YOU TO A THAT YOUR PRESENCE IS REQUIRED, CONTACT THE FOLLOWING PERSO TO APPEAR:  a. Name of subpoening party or attorney:  b. Telephone n	N BEFORE THE DATE ON WHICH YOU AR
Brian M. Brown (949) 2	15-2700
Witness Feos: You are entitled to witness fees and mileage actually traveled both witness fees and mileage actually traveled both witness fees.	ays, as provided by law, if you request them at
the time of service. You may request them before your scheduled appearance from t	he person named in item 2.
DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FR	
ite issued: 2/10/2014	The second secon
rian M. Brown (TYPE OR PRINT NAME)	SNATURE OF PERSON ISSUING SUBPOENA)
. Siphon Centece Higgin, Attorney f	or Plantiff (TITLE)
Requests for Accommodation assistive listening systems, computer-assisted real-time captioning, or sign language intity you ask at least 5 days before the date on which you are to appear. Contact the clerk's assisting the counting of the commodation of the clerk's assisting the counting of the commodation of the counting of the coun	erpreter services are available office or go to

Form Adopted for Mandatory Use Judicial Council of California SUBP-001 [Rev. January 1 2007] Martin Dytant SUNTIAL FORMS\* (Proof of service on reverse)

CIVIL SUBPOENA FOR PERSONAL APPEARANCE AT TRIAL OR HEARING

Code of Civil Procedure §§ 1985, 1986 1987 www.courtmfb.ca.gov

Page 1 of 2

# RECEIVED

Paul Irby, Esq. (State Bar 057379) 194 Shawnee Drive, Wheeling, West Virginia Telephone: (714) 838-5932

Brian M. Brown, Esq.(State Bar 093570) 23161 Mill Creek Dr., Suite 340 Laguna Hills, California 92653 Telephone: (949) 215-2700

Attorney(s) for Plaintiff & Cross-Defendant,
THE REYNOLDS GROUP

# HCA COR CH #744665 ORIGINAL

# SUPERIOR COURT OF THE STATE OF CALIFORNIA

# COUNTY OF ORANGE

THE REYNOLDS GROUP, a California Corporation,

Plaintiff,

VS.

1

2

4

6

7

8

0

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

27

UNIVERSAL MOLDING COMPANY, a California corporation; and DOES 1 through 10, inclusive,

Defendant(s).

AND RELATED CROSS-ACTION.

CASE NO: 30-2012 0054932-CU-BC-CJC

ACKNOWLEDGMENT OF SERVICE OF CIVIL SUBPOENA AND AGREEMENT TO APPEAR

Trial Date: Feb. 10, 2014

Time: 9:30 a.m. Department: C-25

Assigned for all purposes to:

Hon. Thierry Colaw

# ACKNOWLEDGMENT OF SERVICE OF CIVIL SUBPOENA

# AND AGREEMENT TO APPEAR

I hereby acknowledge service of a Civil Subpoena for Personal Appearance at Trial or Hearing, requiring me to appear as a witness in the above-entitled action on February 13, 2014 at 9:30 a.m. in Department C-25 of the Orange County Superior Court, located at 700 Civic Center Drive West, Santa Ana, California 92701. In lieu of appearing at that date and time, I hereby agree to appear at the request of Brian M. Brown,

PLAINTIFF/PETITIONER:	The Reynolds Group,	CASE NUMBER	30-2012	00543932
DEFENDANT/RESPONDENT	Universal Molding Company			

Served this Civil Subpoens for Personal Appearance at Trial or Hearingthy personally delivering a copy to the person served as follows:   Address where served:     RECEIVED			OF CIVIL SUBPOENA
follows:  a. Person served (name):  b. Address where served:  c. Date of delivery:  d. Time of delivery:  e. Witness fees (check one):  (1)	4		
a. Person served (name):  b. Address where served:  c. Date of delivery:  d. Time of delivery:  e. Witness fees (check one). (1)	1,		r realingby personally delivering a copy to the person served as
b. Address where served:  c. Date of delivery:  d. Time of delivery:  e. Witness fees (check one):  (1)  were offered or demanded and paid. Amount:			
c. Date of delivery:  d. Time of delivery:  a. Witness fees (check one):  (1)  were offered or demanded and paid. HCA COR CH # 74 WWS  f. Fee for service:  a. Not a registered California process server.  b. California sheriff or marshal.  c. Registered California process server.  d. Exempt from registration under Business and Professions Code section 22350(b).  f. Registered professional photocopier.  h. Name, address, telephone number, and, if applicable, county of registration and number.  I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.  Date:		a. Person served (name):	
c. Date of delivery:  d. Time of delivery:  a. Witness fees (check one):  (1)  were offered or demanded and paid. HCA COR CH # 74 WWS  f. Fee for service:  a. Not a registered California process server.  b. California sheriff or marshal.  c. Registered California process server.  d. Exempt from registration under Business and Professions Code section 22350(b).  f. Registered professional photocopier.  h. Name, address, telephone number, and, if applicable, county of registration and number.  I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.  Date:			, · · · · · · · · · · · · · · · · · · ·
d. Time of delivery:    Witness fees (check one):		b. Address where served:	/`,
d. Time of delivery:    Witness fees (check one):			16
d. Time of delivery:    Witness fees (check one):		a. Data of delivers	DECENTED \
d. Time of delivery:    Witness fees (check one):		C. Date of delivery.	VECEIVED /
e. Witness fees (check one):  (1)  were offered or demanded and paid. Amount:		d. Time of delivery:	
(1) were offered or demanded and paid. CH # 74 CUS  (2) were not demanded or paid.  (3) Person service:		•	
(1) were offered or demanded and paid. CH # 74 CUS  (2) were not demanded or paid.  (3) Person service:			4:06 PM Del
(2) were not demanded or paid.  1. Fee for service:		· · · <del>_</del>	HCA $COB$
f. Fee for service:			
2. I received this subpoena for service on (date):  3. Person serving:  a.  Not a registered California process server.  b.  California sheriff or marshal.  c.  Registered California process server.  d.  Employee or independent contractor of a registered California process server.  e.  Exempt from registration under Business and Professions Code section 22350(b).  f.  Registered professional photocopier.  g.  Exempt from registration under Business and Professions Code section 22451.  h. Name, address, telephone number, and, if applicable, county of registration and number.  I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.  Date:		(2) were not demanded or paid.	CH # 74 605
2. I received this subpoena for service on (date):  3. Person serving:  a.  Not a registered California process server.  b.  California sheriff or marshal.  c.  Registered California process server.  d.  Employee or independent contractor of a registered California process server.  e.  Exempt from registration under Business and Professions Code section 22350(b).  f.  Registered professional photocopier.  g.  Exempt from registration under Business and Professions Code section 22451.  h. Name, address, telephone number, and, if applicable, county of registration and number.  I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.  Date:		f. Fee for service:\$	•
3. Person serving: a.  Not a registered California process server. b.  California sheriff or marshal. c.  Registered California process server. d.  Employee or independent contractor of a registered California process server. e.  Exempt from registration under Business and Professions Code section 22350(b). f.  Registered professional photocopier. g.  Exempt from registration under Business and Professions Code section 22451. h. Name, address, telephone number, and, if applicable, county of registration and number:  I declare under penalty of perjury under the laws of the State of California sheriff or marshal use only) California that the foregoing is true and correct.  Date:			•
a. Not a registered California process server. b. California sheriff or marshal c. Registered California process server. d. Employee or independent contractor of a registered California process server. e. Exempt from registration under Business and Professions Code section 22350(b). f. Registered professional photocopier. g. Exempt from registration under Business and Professions Code section 22451. h. Name, address, telephone number, and, if applicable, county of registration and number.  I declare under penalty of perjury under the laws of the State of California sheriff or marshal use only) California that the foregoing is true and correct.  Date:	2.	I received this subpoena for service on (date):	
California that the foregoing is true and correct.  Date:  Date:  Date:	3.	<ul> <li>a. Not a registered California process server.</li> <li>b. California sheriff or marshal.</li> <li>c. Registered California process server.</li> <li>d. Employee or independent contractor of a registered Ce.</li> <li>e. Exempt from registration under Business and Profess</li> <li>f. Registered professional photocopier.</li> <li>g. Exempt from registration under Business and Profess</li> </ul>	ions Code section 22350(b).
(SIGNATURE) (SIGNATURE)	Cali	fornia that the foregoing is true and correct.	I certify that the foregoing is true and correct.
(SIGNATURE) (SIGNATURE)	<b></b>		<b>&gt;</b>
		(SIGNATURE)	(SIGNATURE)

1	Esq. upon reasonable notice, which I understand will be at least twenty-
2	four (24) hours.
3	Executed this day of February, 2014 at
4	California.
5	LUIS LODRIQUEZA
6	
7	Business Telephone:
8	Cell Phone:
9	Email:
10	
11	Please <u>date and sign</u> this agreement, and return it to Brian M.
12	Brown, Esq. at Fax. No. (949) 743-3000, or in PDF format to:
13	brianbrown@oclaborlawyer.com
14	
15	
16	RECEIVED
17	FEB 102"4
18	HCA COR
19	
20	CH # 74665
21	
22	
23	
24	
25	
26	

28